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13 *Attorneys for Plaintiffs Sierra Club, Inc.,*  
14 *Surfrider Foundation, Inc., Heal the Bay,*  
15 *Inc., and Baykeeper, Inc.*

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA

18 SIERRA CLUB, INC.,  
19 SURFRIDER FOUNDATION, INC.,  
20 HEAL THE BAY, INC., and  
21 BAYKEEPER, INC., each a California  
22 Nonprofit,

23 Plaintiffs,

24 v.

25 EXXONMOBIL CORPORATION, a New  
26 Jersey Corporation, and DOES 1-10,

27 Defendants.  
28

CASE NO. 3:24-cv-07288-RS

JOINT STIPULATION AND [PROPOSED]  
ORDER RELATING CASES

Pursuant to Civil Local Rules 3-12, 7-11, and 7-12, the parties, by and through their undersigned counsel, stipulate and agree as follows:

On September 23, 2024, *Sierra Club, Inc., et al. v. ExxonMobil Corporation*, Case No. CGC 24-618321 (“Non-Profits’ action”) was filed in California Superior Court, San Francisco County. On October 18, 2024, defendant Exxon Mobil Corporation (“ExxonMobil”) removed the Non-Profits’ action to this Court, which was then designated as Case No. 3:24-cv-07288-RS.

Also on September 23, 2024, *People of the State of California, ex rel. Rob Bonta, Attorney General of California v. Exxon Mobil Corporation*, Case No. CGC 24-618323 (“California AG’s action”) was filed in California Superior Court, San Francisco County. On November 1, 2024, ExxonMobil removed the California AG’s action to this Court, which is currently designated as Case No. 4:24-cv-07594-HSG.

Both cases assert similar legal claims, involve the same defendant, are based on similar alleged events, and will involve an overlap in discovery. *See* Civil Local Rule 3-12(a)(1). As such, there is or may be likelihood “that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges.” *See* Civil Local Rule 3-12(a)(2).

This stipulation is not intended to operate as an admission of any factual allegation or legal conclusion and is submitted subject to and without waiver of any right, claim, defense, affirmative defense, or objection, including personal or subject matter jurisdiction.

ACCORDINGLY, THE PARTIES STIPULATE AND AGREE, that:

1. Case No. 4:24-cv-07594-HSG shall be reassigned to the Hon. Richard Seeborg and shall be designated as Case No. 3:24-cv-07594-RS.
2. Any case management conference in any reassigned case will be rescheduled by the Court.

Dated: November 11, 2024

By: /s/ Grace Y. Park

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Dated: November 11, 2024

By: /s/ Gabriel R. Martinez

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Dated: November 11, 2024

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PURSUANT TO STIPULATION, IT IS  
SO ORDERED.

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The Honorable Richard Seeborg  
United States District Judge